

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Cr. No. 21-173 (PJS/DTS)

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	DEFENDANT’S MOTION TO
v.)	LEAVE HALFWAY HOUSE
)	FOR CHRISTMAS HOLIDAY
GISELA CASTRO MEDINA (2),)	
)	
Defendant.)	

The purpose of this motion is to request that Ms. Medina be permitted to leave the halfway house from Friday, December 24, 2021 at 2:00 p.m. until Saturday, December 25, 2021 at 2:00 p.m. to spend the Christmas holiday with her family at her parents’ home.

On September 23, 2021, the Honorable Becky R. Thorson set conditions of release in Ms. Medina’s case (ECF No. 52). The conditions include home detention at a halfway house (*id.* at p. 3). On November 24, 2021, Ms. Medina requested permission to spend Thanksgiving day at her parents’ house (ECF No. 91). This Court granted the request (ECF No. 93). While away from the halfway house, Ms. Medina complied with all of her conditions and did what she was asked.

Ms. Medina now moves this Court to allow her to leave the halfway house to spend the Christmas holiday with her family at her parents’ house for 24 hours with the following conditions:

1. Ms. Medina is permitted to be away from her halfway house from Friday, December 24, 2021 at 2:00 p.m. until Saturday, December 25, 2021 at 2:00 p.m.
2. Ms. Medina shall leave the halfway house no earlier than 2:00 p.m. on Friday, December 24, 2021 and go to her parents' house. She shall be back at the halfway house no later than 2:00 p.m. on Saturday, December 25, 2021. Ms. Medina shall not make any unapproved stops during transit.
3. If any alcohol is present or any minors other than her sister arrive, Ms. Medina shall immediately leave and return to the halfway house.
4. Ms. Medina shall call the halfway house when she arrives at her parents' house and shall respond to their calls as directed by the halfway house.
5. All other pretrial release conditions remain in effect.

Respectfully submitted,

RYAN GARRY, ATTORNEY, LLC

Dated: December 16, 2021

s/ Elizabeth Duel

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